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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

11 HAYRI OLIVAS-ARENAS, individually,
12 Plaintiff,

13 vs.

14 HOBBY LOBBY STORES, INC. d/b/a
15 HOBBY LOBBY #679 d/b/a HOBBY
16 LOBBY; 2199 NORTH RAINBOW
BOULEVARD HOLDINGS, LLC; DOES 1
17 through 100 and ROE CORPORATIONS 1
through 100, inclusive,

18 Defendants.
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Case No.: 2:19-cv-00624-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S DEADLINE
FOR FILING RESPONSES TO
DEFENDANTS' MOTIONS IN LIMINE
(SECOND REQUEST)**

20 Plaintiff HAYRI OLIVAS-ARENAS, by and through her attorneys of record, FARHAN
21 R. NAQVI and PAUL G. ALBRIGHT of NAQVI INJURY LAW, and Defendant HOBBY
22 LOBBY STORES, INC. d/b/a HOBBY LOBBY #679 d/b/a HOBBY LOBBY ("Defendants"), by
23 and through its attorney of record, MICHAEL P. LOWRY of WILSON, ELSER, MOSCOWITZ,
24 EDELMAN & DICKER, LLP, hereby stipulate and agree as follows:
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1 **IT IS HEREBY STIPULATED AND AGREED** that the deadline for Plaintiff to file her
2 responses to all motions in limine recently filed by Defendants be extended to **November 30,**
3 **2023**, including:

- 4 1. *Hobby Lobby Stores, Inc. 's Motion in Limine 1: Thomas Jennings* [Doc. 58];
- 5 2. *Hobby Lobby Stores, Inc.'s Motion in Limine 2: Causation Testimony from Treating*
6 *Physicians* [Doc. 59];
- 7 3. *Hobby Lobby Stores, Inc. 's Motion in Limine No. 3: Undisclosed Damages* [Doc. 60];
- 8 4. *Hobby Lobby Stores, Inc. 's Motion in Limine No. 4: Mark James' Felony Conviction* [Doc.
9 61];
- 10 5. *Hobby Lobby Stores, Inc. 's Motion in Limine No. 5: Speculation as to When Spill was*
11 *Created* [Doc. 62]; and
- 12 6. *Hobby Lobby Stores, Inc. 's Motion in Limine No. 6: Post Fall Investigation* [Doc. 63].

13 In accordance with L.R. 16-3(a), replies will only be allowed with leave of court.

14 This stipulation is not brought for purposes of undue delay or any other improper purpose.
15 Several good causes exist for this extension. Firstly, the trial in this matter is currently set for
16 January 29, 2024, thereby rendering **December 29, 2024 as the deadline to file motions in limine**
17 pursuant to L.R. 16-3(a). Defense counsel filed the foregoing motions **six (6) months early** out
18 of an abundance of caution, as he is concerned that he will be very busy at the end of the year with
19 other trials. Secondly, Plaintiff's counsel has a **firm setting on October 23, 2023** in a district
20 court case. The trial is expected to last at least two (2) weeks. Lastly, Plaintiff's counsel, Paul
21 G. Albright, Esq., has recently inherited many cases from another one of the associates in his firm,
22 Elizabeth E. Coats, Esq., who is **out of the office until January 2024 for maternity leave.**
23 Plaintiff's counsel will be covering her cases while she is out of the office, further limiting the
24 time and attention required to fully respond to Defendant's pending motions at this time.
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1 Therefore, the parties respectfully request that the deadline for Plaintiff to file her
2 responses to all of Defendant's motions in limine be extended from October 27, 2023 to
3 **November 30, 2023**, which is still one (1) month prior to the deadline to file motions in limine.
4 This will not cause any delay in the proceedings.

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7 DATED this 17th day of October, 2023.

8 NAQVI INJURY LAW


9 /s/ Paul G. Albright
10 FARHAN R. NAQVI
11 Nevada Bar No. 8589
12 PAUL G. ALBRIGHT
13 Nevada Bar No. 14159
9500 W. Flamingo Rd, Suite 104
Las Vegas, NV 89147
Attorneys for Plaintiff

DATED this 17th day of October, 2023.

WILSON ELSER MOSKOWITZ EDELMAN
& DICKER, LLP

/s/ Michael P. Lowry
MICHAEL P. LOWRY
Nevada Bar No. 10666
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
Attorney for Defendants

14 **IT IS SO ORDERED:**

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18 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

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20 Dated: October 18, 2023